

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP., Plaintiff,	§	
	§	Case No. 2:24-cv-00093-JRG
	§	(Lead Case)
v.	§	
	§	
HEWLETT PACKARD ENTERPRISE COMPANY,	§	<b>JURY TRIAL DEMANDED</b>
Defendant.	§	
	§	
	§	
	§	
	§	
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VIRTAMOVE, CORP., Plaintiff,	§	
	§	Case No. 2:24-CV-00064-JRG
	§	(Member Case)
v.	§	
	§	
INTERNATIONAL BUSINESS MACHINES CORP.,	§	<b>JURY TRIAL DEMANDED</b>
Defendant.	§	
	§	
	§	
	§	

**CORRECTED UNOPPOSED MOTION FOR EXTENSION AND TO AMEND DOCKET  
CONTROL ORDER**

Plaintiff VirtaMove Corp. (“VirtaMove”) respectfully moves the Court extend the fact-discovery deadline by two weeks in the above captioned-cases for VirtaMove, Hewlett Packard Enterprise Company (“HPE”), and International Buisness Machines Corp. (“IBM”) (collectively, the “Parties”). Specifically, the Parties ask that the deadline to complete fact discovery and file motions to compel discovery be extended from May 15, 2025 to May 29, 2025, with all following deadlines modestly shifted pursuant to the attached Exhibit. This request is unopposed.

Good cause exists for this extension. VirtaMove alleges there are trial conflicts in the schedules of certain of VirtaMove team members. VirtaMove has diligently corresponded with the Parties, requested additional time to complete fact discovery, and HPE and IBM have agreed to

the proposed extension as a courtesy and compromise in good faith. In particular, given that certain counsel for VirtaMove are in trial this week in *Headwater v. Samsung*, No. 2:23-cv-00103 (E.D. Tex.), that has limited their availability and has imposed constraints on the scheduling of depositions. This Motion is not made for purposes of delay, will not prejudice any party, and, if granted, will not interfere with any other deadline in this case. There have been no other extension requests related to the deadlines contemplated herein.

For these reasons, VirtaMove submits that good cause exists to extend the aforementioned deadlines in this matter and respectfully request that the Court grant this Unopposed Motion accordingly.

Dated: April 24, 2025

Respectfully submitted,

By: /s/ Reza Mirzaie

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*Attorneys for Plaintiff VirtaMove, Corp.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on April 24, 2025.

/s/ Daniel B. Kolko  
Daniel B. Kolko

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is a joint motion.

/s/ Daniel B. Kolko  
Daniel B. Kolko